

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
SOUTHERN DIVISION**

TERPSEHORE MARAS,

Plaintiff,

v.

**CHATTANOOGA NEWS CHRONICLE,
THEHUFFINGTONPOST, INC.,
REPRESENTATIVE STEVEN COHEN,
US DOMINION, INC., DOMINION
VOTING SYSTEMS, INC., DOMINION
VOTING SYSTEMS CORPORATION,
MEDIA MATTERS FOR AMERICA,
OHIO INTELLIGENCE TIPS, ROSS
ELDER, and ALI ABDUL RAZAQ
AKBAR a/k/a ALI ALEXANDER,**

Defendants.

No. 1:21-cv-00317-DCLC-CHS

District Judge Clifton L. Corker

Magistrate Judge Christopher H. Steger

DECLARATION OF WHITNEY SNYDER

I, Whitney Snyder, hereby declare:

1. I am Deputy Editor at TheHuffingtonPost.com, Inc. (“HuffPost”). The following facts are true of my own personal knowledge, except for any matters stated on information and belief, which I am informed and believe to be true.

2. HuffPost is incorporated in the state of Delaware and has its principal place of business in the state of New York. HuffPost does not maintain any offices in Tennessee, does not own property in property in Tennessee, and does not have employees in Tennessee.

3. On December 25, 2020, HuffPost published an article online titled “Sidney Powell’s Key Election Witness Is A Pro-Trump Podcaster Once Sued For Fraud: Report,” which was subsequently updated on December 26, 2020 (hereinafter referred to as “the Article”). The Article is one of national interest, and does not mention the state of Tennessee.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Brooklyn, New York, on February 4, 2022.


Whitney Snyder

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2022, a true and exact copy of the foregoing was filed via the Court's CM/ECF system. Notice of this filing is anticipated to be sent by operation of the Court's electronic filing system to all registered counsel of record, including the following:

Russell A. Newman
6688 Nolensville Road, Suite 108-22
Brentwood, TN 37027
russell@thenewmanlawfirm.com
Counsel for Plaintiff

Douglas N. Letter
Todd B. Tatelman
Sarah Clouse
Brooks M. Hanner
5140 O'Neill House Office Building
Washington D.C. 20515
Douglas.Letter@mail.house.gov
Todd.Tatelman@mail.house.gov
Sarah.Clouse@mail.house.gov
Brooks.Hanner@mail.house.gov
Counsel for Defendant Steve Cohen

W. Scott Sims
Michael R. O'Neill
SIMS | Funk, PLC
3322 West End Ave.
Suite 200
Nashville, TN 37203
ssims@simsfunk.com
moneill@simsfunk.com
*Counsel for Defendants U.S.
Dominion, Inc., Dominion Voting
Systems, Inc., and Dominion Voting
Systems Corporation*

And via first-class U.S. mail to the following non-registered users:

Media Matters for America
75 Broadway Street, Suite 202
San Francisco, CA 94111

Ali Abdul Razaq a/k/a Ali Alexander
5125 Pinellas Avenue
Keller, TX 76244

s/Robb S. Harvey